

THE HONORABLE THOMAS S. ZILLY

IN THE UNITED STATES DISTRICT COURT
FOR THE WESTERN DISTRICT OF WASHINGTON

HUNTERS CAPITAL, LLC, et al.,

Case No. 2:20-cv-00983-TSZ

Plaintiffs,

vs.

CITY OF SEATTLE,

Defendant.

DECLARATION OF GABRIEL REILLY-BATES IN SUPPORT OF PLAINTIFFS' MOTION TO EXCLUDE TESTIMONY OF DEFENDANT'S EXPERT BATES MCKEE, III

NOTED ON MOTION CALENDAR:

February 17, 2022

I, Gabriel Reilly-Bates, declare as follows:

1. I am an attorney with Morgan, Lewis & Bockius LLP and represent Plaintiffs in the above-captioned action. I am over eighteen years of age and am competent to testify herein. I make the following statements based on my personal knowledge.

2. Attached hereto as **Exhibit 1** is a true and correct copy of expert report of Bates McKee, III, dated April 28, 2022.

DECLARATION OF GABRIEL REILLY-BATES
IN SUPPORT OF PLAINTIFFS' MOTION TO
EXCLUDE TESTIMONY OF DEFENDANT'S
EXPERT BATES MCKEE, III
(Case No. 2:20-cv-00983-TSZ) - 1

MORGAN, LEWIS & BOCKIUS LLP
ATTORNEYS AT LAW
1301 SECOND AVENUE, SUITE 2800
SEATTLE, WASHINGTON 98101
TEL +1.206.274.6400 FAX +1.206.274.6401

3. Attached hereto as **Exhibit 2** is a true and correct copy of relevant excerpts from deposition transcript of Bates McKee, III, taken on August 24, 2022.

4. Attached hereto as **Exhibit 3** is a true and correct copy of relevant exhibits from deposition of Bates McKee, III, taken on August 24, 2022.

5. Attached hereto as **Exhibit 4** is a true and correct copy of rebuttal report of Bates McKee, III, dated June 3, 2022.

6. Attached hereto as **Exhibit 5** is a true and correct copy of updated expert report of Bates McKee, III, dated August 30, 2022.

I declare under the penalty of perjury under the laws of the United States of America and the State of Washington that the foregoing is true and correct.

DATED this 2nd day of February, 2023 at Vashon Island, Washington.

s/ Gabriel Reilly-Bates

Gabriel Reilly-Bates

DECLARATION OF GABRIEL REILLY-BATES
IN SUPPORT OF PLAINTIFFS' MOTION TO
EXCLUDE TESTIMONY OF DEFENDANT'S
EXPERT BATES MCKEE, III
(Case No. 2:20-cv-00983-TSZ) - 2

MORGAN, LEWIS & BOCKIUS LLP
ATTORNEYS AT LAW
1301 SECOND AVENUE, SUITE 2800
SEATTLE, WASHINGTON 98101
TEL +1.206.274.6400 FAX +1.206.274.6401